



**INTERNATIONAL ASSOCIATION OF  
BLACK PROFESSIONAL FIRE FIGHTERS  
AND THE  
BLACK CHIEF OFFICERS COMMITTEE**

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**LIFETIME MEMBER  
NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE**

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Development of Operational, Technical and	)	WT Docket No. 96-86
Spectrum Requirements for Meeting Federal,	)	
State and Local Public Safety	)	
Communications Requirements Through the	)	
Year 2010	)	
	)	
Service Rules for the 698-746, 747-762	)	WT Docket No. 06-150
and 777-792 MHz Bands	)	
	)	
Former Nextel Communications, Inc.	)	WT Docket No. 06-169
Upper 700 MHz Guard Band	)	
Licenses and Revisions to Part 27 of	)	
the Commission's Rules	)	
	)	
Implementing a Nationwide,	)	PS Docket No. 06-229
Broadband, Interoperable Public	)	
Safety Network in the 700 MHz	)	
Band	)	

**COMMENTS OF INTERNATIONAL ASSOCIATION OF BLACK  
PROFESSIONAL FIRE FIGHTERS AND BLACK CHIEF OFFICER’S  
COMMITTEE**

The International Association of Black Professional Fire Fighters and the Black Chief Officer’s Committee (IABPFF/BCOC) hereby submits these comments in response to the Commission’s *Further Notice of Proposed Rulemaking* in the above-captioned proceedings.

The International Association of Black Professional Fire Fighters (IABPFF) was established over 35 years ago and represents over 5,000 fire service personnel. The Black Chief Officer’s Committee (BCOC) represents the fire chiefs and officers of the International Association of Black Professional Fire Fighters. One of our main missions is to improve the educational awareness and enhance employment and upward mobility for black chief officers and fire fighters.

The IABPFF/BCOC urges the Federal Communications Commission not to pursue its tentative conclusion to reallocate spectrum previously designated for wideband use and designate it for broadband use only, thereby prohibiting public safety’s option to implement any wideband operations. The IABPFF/BCOC agrees with the numerous public safety entities that support the concept of a nationwide public safety broadband network in the 700 MHz public safety data band.<sup>1</sup> However, we also agree with the many, and often the same, public safety entities who filed comments that public safety needs to have the flexibility to choose the solution that best fits their requirements.

Firefighters, emergency medical service personnel, and all other first responders are increasingly depending on advanced data communications to supplement their

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<sup>1</sup> Further Notice of Proposed Rulemaking at paragraph 252 in the above captioned proceedings.

mission critical voice communications. We believe a nationwide broadband network offers great promise for the first responder community, assuming that such network carrier will build out to public safety coverage and operational requirements. We point out that the current proposals by the Commission and Frontline indicate an eight to ten year build out schedule, which at the end still leave many of the country's less populated areas in question as to when, if ever, such a nationwide commercial network will provide jurisdictional coverage for many of the agencies servicing these areas.<sup>2</sup> Under the Commission's tentative conclusion, all public safety entities will have no option but to wait for a carrier to build out a nationwide broadband network. While agencies in the most populated areas will have the shortest wait (proposed three to four years), agencies in mostly rural low population density areas are much less fortunate and may have to wait a long time before such a carrier network provides the needed coverage into their jurisdictions. Unfortunately, under the Commission's proposal, these agencies also do not have any other choice.

The IABPFF/BCOC therefore urges the Commission to adopt rules that permit public safety users the flexibility to implement a high speed data solution that meets their operational, coverage and budget requirements in a timely manner. At least a portion of the public safety data spectrum should be made available for such local/regional decision making by public safety entities, especially in the interim period during which they wait for the nationwide broadband network to provide coverage in their jurisdictional area. Whether the choice is broadband or wideband, a local/regional network or a nationwide network, local agencies must have the option to make these decisions on a local or

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<sup>2</sup> FNPRM at paragraphs 212-213 and 274.

regional level. First responders and the citizens we serve and protect cannot wait for a one solution only option, mandated by the Commission, to reach our jurisdictional areas.

May 21, 2007

Respectfully submitted,

A handwritten signature in black ink that reads "Johnny J. Brewington". The signature is written in a cursive style with a large, stylized "J" and "B".

Johnny J. Brewington, IABPFF President

A handwritten signature in blue ink that reads "Raymond Brooks". The signature is written in a cursive style with a large, stylized "R" and "B".

Raymond Brooks, BCOC Chairman